

1 **JENNY L. FOLEY, Ph.D., ESQ.**

Nevada Bar No. 9017

2 **HKM EMPLOYMENT ATTORNEYS LLP**

3 1785 East Sahara, Suite 325

Las Vegas, Nevada 89104

4 Tel: (702) 625-3893

Fax: (702) 625-3893

5 E-mail: jfoley@hkm.com

*Attorney for Plaintiff*

7  
8 **UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

9 MICHAEL D. JACKSON

**CASE NO: 2:14-CV-01794**

10 Plaintiff,

11 vs.

**STIPULATION AND ORDER TO  
VACATE HEARING**

12 CITY OF LAS VEGAS; STEVE SMITH,  
13 an individual; MAUREEN HIGGINS-  
14 TEAGUE, an individual; DOE Defendants I  
Through X, inclusive; and ROE  
15 CORPORATIONS A through Z, inclusive,

16 Defendants.

17  
18 COMES NOW, the Plaintiff, Michael D. Jackson hereinafter ("Jackson") by and  
19 through their attorney, Jenny L. Foley, Ph.D., Esq., of the law firm of HKM Employment  
20 Attorneys LLP, and Defendants, CITY OF LAS VEGAS; STEVE SMITH, an individual;  
21 MAUREEN HIGGINS-TEAGUE, an individual; DOE Defendants Through X, inclusive; and  
22 ROE CORPORATIONS A through Z, inclusive ("Defendants"), by and through their attorney,  
23 Jack O. Eslinger, Esq. of the Las Vegas City Attorney's Office and hereby stipulate as follows:

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25 1. That the parties have reached an agreement to settle regarding the issues set forth  
26 in Plaintiffs' Complaint.

1           2.       That the Settlement Conference scheduled for Tuesday, June 19, 2018 at 11:30  
2 a.m. be vacated due to a settlement being reached.

3           3.       The substantive terms of the settlement are as follows:

4                   a.   Defense counsel will provide a settlement agreement with the terms set forth  
5                       to Plaintiff's counsel in the next 14 days.

6                   b.   The parties aver and agree that the settlement in this matter resolves a bona  
7                       fide dispute.

8                   c.   The parties aver and agree that the settlement was reached after contested  
9                       litigation.  
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11  
12           The Court shall maintain continuing jurisdiction of this matter for all disputes which  
13 arise from the settlement.  
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15           This request for the Court's approval and judgment is made in good faith.

16 Dated this 14<sup>th</sup> day of June, 2018.

Dated this 14<sup>th</sup> day of June, 2018

17 **HKM Employment Attorneys LLP**

**Las Vegas City Attorney's Office**

18  
19           /s/ Jenny L. Foley  
20 Jenny L. Foley, Ph.D., Esq.  
21 Nevada Bar No. 9017  
22 1785 East Sahara Ave., Suite 325  
Las Vegas, Nevada 89104

/s/ Jack O. Eslinger  
Jack O. Eslinger, Esq.  
Nevada Bar No. 8443  
6851 West Charleston Blvd.  
Las Vegas, Nevada 89117

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1. That the parties have settled all claims raised in Plaintiffs' Complaint.
2. That the Settlement Conference scheduled for Tuesday, June 19, 2018 at 11:30 a.m. is vacated due to a settlement being reached.
3. The substantive terms of the settlement are as follows:
  - a. Defense counsel will provide a settlement agreement with the terms set forth to Plaintiff's counsel in the next 14 days.
  - b. The settlement in this matter resolves a bona fide dispute.
  - c. The settlement was reached after contested litigation.

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The Court shall maintain continuing jurisdiction of this matter ~~for all issues related to~~ and order of dismissal is filed. IT IS HEREBY ORDERED that the proposed stipulation ~~the settlement and its enforcement.~~

and order for dismissal must be filed on or before July 30, 2018. IT IS FURTHER ORDERED that a status check is scheduled for 11:00 AM, August 3, 2018, in Courtroom 3D.

Dated: June 15, 2018

Carla F. Kopp

UNITED STATES MAGISTRATE JUDGE

Respectfully submitted by:  
**HKM Employment Attorneys LLP**

/s/ Jenny L. Foley  
Jenny L. Foley, Ph.D., Esq.  
Nevada Bar No. 9017  
1785 East Sahara Ave, Suite 325  
Las Vegas, Nevada 89104  
*Attorney for Plaintiff*